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Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF DAVID MONSEES
IN SUPPORT OF GOOGLE'S MOTION
FOR CLARIFICATION OF CLASS
DEFINITION**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor
Action Filed: July 14, 2020

1 I, DAVID MONSEES, respectfully submit this declaration in regard to the above
2 captioned matter. I make this declaration based on my personal knowledge of the facts stated
3 herein.

4 1. I am employed at Google LLC (“Google”) as a Senior Product Manager with
5 supervisory authority concerning Web & App Activity (“WAA”). I joined Google in 2009 and
6 have been a Product Manager since December 2009. Unless otherwise stated, the facts I set forth
7 in this declaration are based on my personal knowledge or knowledge I obtained through my
8 review of corporate records or other investigations. If called to testify as a witness, I could and
9 would testify competently to such facts under oath.

10 2. I submit this declaration in support of Google’s Motion for Clarification of Class
11 Scope of the Court’s Class Certification Order.

12 3. In my role at Google, I have overseen the WAA product area and am familiar with
13 the nuances and constraints of various Google account types and how they interface with WAA.

14 4. Beyond the standard Google Account available to the general public, Google also
15 provides specialized accounts known internally at Google as “Dasher” and “Unicorn” accounts.

16 5. The term “Dasher” refers to enterprise-level accounts designed for use by employees
17 and similar users within an organization. These accounts are managed by an enterprise
18 administrator.

19 6. Enterprise organizations managing Dasher-type Google accounts for their users
20 control both the initial account settings and the range of Google services provided to the user. For
21 instance, many Dasher accounts grant access to the Google Workspace suite, including Google
22 Drive, Google Docs, and Google Sheets, but may restrict access to Gmail.

23 7. For all Dasher accounts, the administrator creates the account and chooses the
24 setting and range of Google services enabled for the account. The user for whom the account is
25 made does not see or set the Google privacy-related account settings, including WAA and sWAA,
26 at account creation..

27 8. The term “Unicorn” refers to accounts designed for children under the age of 13,
28 that are created and supervised by their parents or guardians. These accounts come with distinct

1 privacy considerations. Their creation and management necessitate a separate Google account
2 belonging to the parent, through which parents control account settings, including privacy-related
3 settings.

4 9. Parents possess similar authority over Unicorn settings, such as sWAA, and this
5 authority extends to allowing parents to decide if their children can modify their activity controls
6 at all.

7 10. Certain Unicorn accounts can be established by parents without the need for creating
8 an email address and password for the child. Within these accounts, parents have the capability to
9 prevent their children from downloading any apps from the Google Play Store on Android devices
10 signed in with the Unicorn account.

11 11. For all Unicorn accounts, because the parent creates the account, the child for whom
12 the account is made does not see or set the Google privacy-related account settings, including
13 WAA and sWAA, at account creation.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed March 15, 2024, at San Francisco, California.

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20 DAVID MONSEES
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